

N.I. 2011-Q-717
N.Q. 5000028273

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:	CASE NO. 11-3113 MCF
<u>JOSE ANTONIO GARCIA ALSINA</u> Debtor(s)	CHAPTER 13
QUANTUM SERVICING, CORP. as agent of REO Properties, Corp.	11 USC 362 d(1) d(2)
Movant	Relief from stay for cause
<u>JOSE ANTONIO GARCIA ALSINA</u> And Chapter 13 Trustee, Alejandro Oliveras Rivera Respondent(s)	

STIPULATION

TO THE HONORABLE COURT:

Comes now the parties through their respective attorneys and respectfully state and pray:

1. That Quantum Servicing Corp. as agent of REO Properties Corp. filed a Motion for Relief of Stay (Docket 24).

2. That the first hearing was set for September 28, 2011 and at that hearing the final hearing was set for October 18, 2011, which hearing has now been reset to October 19, 2011, together with the confirmation hearing.

3. That debtor has paid the arrears claimed in the amount of \$2,979.32

4. That the balance pending is for costs and attorneys fees.

5. That the parties have agreed that debtor will pay the costs and attorneys fees in two installments of \$400.00 each due on November 1 and December 1, 2011 which payments will be sent to Quantum with the regular monthly payment.



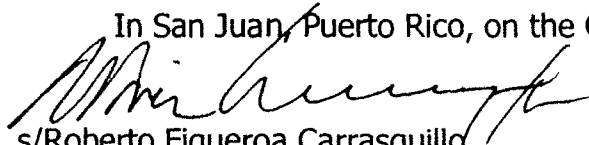
6. That the parties have agreed that although the motion for relief will be deemed withdrawn Quantum will have the right to move the court to set aside this stipulation and grant the motion if debtor does not comply with the payments hereby agreed.

7. If by December 15, 2011 Quantum has not moved the court to set aside this stipulation then the Motion for Relief will be deemed permanently withdrawn

WHEREFORE, for the appearing parties move this Honorable Court to approve this stipulation.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on the **October 14, 2011.**



s/Roberto Figueroa Carrasquillo

Roberto Figueroa Carrasquillo

USDC #203614

Attorney for debtor respondent

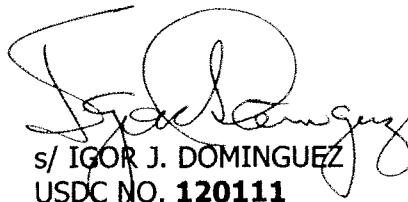
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s/ IGOR J. DOMINGUEZ

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QUANTUM SERVICING, CORP.

as agent of REO PROPERTIES CORP.

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